

From: [Roushey, Jennifer S. \(DNREC\)](#)
To: [McGuigan, David](#); [Trulear, Brian](#); [Capacasa, Jon](#)
Cc: [Ashby, Bryan A. \(DNREC\)](#); [Davis, Glenn F. \(DNREC\)](#); [Holmes, Virgil \(DNREC\)](#); [Hummel, Anthony E.](#)
Subject: RE: Harim Millsboro Permit Renewal Application
Date: Thursday, June 04, 2015 8:07:51 AM

Hi David,

Regarding #1, my permit writer for this facility (Tony Hummel) did a cursory technical review of the app and noted the same thing. Tony is requesting that they provide us the basis and calculation for the offsets. We can forward that to you once we receive it.

Regarding #2, Tony did confirm with the permittee that they do not intend to take on brewery waste once the upgraded facility is up and running since this is just to keep the bugs happy in the interim. Currently I believe there is a security guard, the wastewater manager, and a maintenance guy that work at the facility and that is all. I have not posed this question to them about shutting down entirely until the upgraded facility is in place, although others at DNREC may have had that discussion with them. However, I would assume they are keeping their options open at this point until there is some resolution on final path forward (i.e. Brownfields stuff is resolved and a NPDES permit renewal that supports their plans is obtained). I also don't know if they will start up office operations there during the facility upgrade process, in which case they would need the ability to have bathroom facilities for employees. They state in their application that they will continue to operate the existing wastewater treatment system at a minimal level as possible which indicates to me they want to maintain it to keep their options open.

Regards,

Jenn

Jennifer S. Roushey
Program Manager I
Stormwater & Discharge Permits
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(302)739-9946

From: McGuigan, David [mailto:McGuigan.David@epa.gov]
Sent: Wednesday, June 03, 2015 2:56 PM
To: Roushey, Jennifer S. (DNREC); Trulear, Brian; Capacasa, Jon
Cc: Ashby, Bryan A. (DNREC); Davis, Glenn F. (DNREC); Holmes, Virgil (DNREC)
Subject: RE: Harim Millsboro Permit Renewal Application

Jen,

Thank you for the renewal application. I gave the application a quick overview and had a couple of questions:

- 1) I see they intend to use offsets, and propose a couple of projects (production well credits and also corn crop fertilizer credits). Did they provide you the basis and calculation for the offsets? I looked at the application and could find no explanation or justification for the offsets proposed.
- 2) Given that this WWTP facility is a replacement of the existing facility, is there any reason to keep the existing facility operating. The original justification for taking brewery waste was to keep the bugs alive until operations resumed. As you will be replacing the facility, why is that necessary? Is there any ongoing operations at the facility?

Thanks

David

David B. McGuigan, Ph.D.

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From: Roushey, Jennifer S. (DNREC) [<mailto:Jennifer.Roushey@state.de.us>]

Sent: Wednesday, June 03, 2015 11:56 AM

To: McGuigan, David; Trulear, Brian; Capacasa, Jon

Cc: Ashby, Bryan A. (DNREC); Davis, Glenn F. (DNREC); Holmes, Virgil (DNREC)

Subject: Harim Millsboro Permit Renewal Application

Good almost-afternoon gentlemen,

Per your request at yesterday's meeting, attached please find the Harim Millsboro LLC, NPDES permit renewal application submitted to our office on March 2, 2015. Thank you again for meeting with us yesterday. We look forward to working with you and other members of the Region 3 team on the program improvement efforts we discussed.

Regards,

Jenn

Jennifer S. Roushey

Program Manager I

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